

Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
(202) 974-1500 (Phone)
(202) 974-1999 (Facsimile)
mlazerwitz@cgsh.com

*Counsel for Defendants LG Display Co., Ltd. and
LG Display America, Inc.*

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

CASE NO. 3:07-md-1827 SI
MDL NO. 1827

This Document Relates To:

State of New York v. AU Optronics Corp., et al.,
3:11-cv-711 SI

STIPULATION AND [PROPOSED] ORDER

The Honorable Susan J. Illston

WHEREAS, on March 15, 2011, the State of New York ("State") filed an Amended

Complaint in the above-captioned case (Dkt. No. 2556), in which the State brings claims assigned to it by alleged assignors such as “Dell, Hewlett-Packard, IBM, Apple, Lenovo, Fujitsu America, Inc., Seneca Data and Great Lakes,” among other unnamed alleged assignors;

WHEREAS, Interrogatory No. 9 of LG Display America Inc.'s First Set of Interrogatories on the State of New York, served on February 17, 2011, asked the State to "[i]dentify all entities whose claims you purport to assert in the Complaint, including . . . all assignors;"

WHEREAS, on April 20, 2011 the State, in response to Interrogatory No. 9, stated that "for the purposes of this action going forward, New York has decided to pursue only the claims assigned

1 to it by Dell, Inc. ('Dell'), Hewlett Packard Company ('HP'), International Business Machines
2 Corporation ('IBM') and Lenovo;" and

3 WHEREAS the State accordingly now wishes to voluntarily dismiss with prejudice all claims
4 brought on behalf of assignors other than Dell, HP, IBM and Lenovo;

5 THEREFORE, the State and defendants hereby agree:

6

7 1. All claims based on assignments from companies other than Dell, HP, IBM and
Lenovo are dismissed.

8 2. The parties respectfully request the Court to enter this stipulation as an order.

9

10 IT IS SO STIPULATED.

11 DATED: May 5, 2011

12

13

14

15 By: /s/ Michael R. Lazerwitz
Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
(202) 974-1500 (Phone)
(202) 974-1999 (Facsimile)
mlazerwitz@cgsh.com

16

17

18

19

20

21

22

23

24

25

26

27

28

Attorneys for Defendants
LG Display Co., Ltd. and LG Display America, Inc.

1 By: /s/ Christopher A. Nedeau
2 Christopher A. Nedeau
3 Carl L. Blumenstein
4 Allison Dibley
5 NOSSAMAN LLP
6 50 California Street, 34th Floor
7 San Francisco, CA 94111
8 (415) 398-3600 (Phone)
9 (415) 398-2438 (Facsimile)
10 *cnedreau@nossaman.com*

11 *Attorneys for Defendants*
12 AU Optronics Corporation and AU Optronics
13 Corporation America

14 By: /s/ Christopher B. Hockett
15 Christopher B. Hockett (Bar No. 121539)
16 Neal A. Potischman (Bar No. 254862)
17 Sandra West (Bar No. 250389)
18 Samantha H. Knox (Bar No. 254427)
19 DAVIS POLK & WARDWELL LLP
20 1600 El Camino Real
21 Menlo Park, California 94025
22 (650) 752-2000 (Phone)
23 (650) 752-2111 (Facsimile)
24 *chris.hockett@davispolk.com*

25 *Attorneys for Defendants Chimei Innolux Corporation*
26 *(f/k/a Chi Mei Optoelectronics Corp.), Chi Mei*
27 *Optoelectronics USA, Inc., and CMO Japan Co., Ltd.*

28 By: /s/ Kent M. Roger
29 Kent M. Roger (State Bar No. 95987)
30 Michelle Kim-Szrom (State Bar No. 252901)
31 MORGAN LEWIS & BOCKIUS LLP
32 One Market, Spear Street Tower
33 San Francisco, CA 94105-1126
34 (415) 442-1000 (Phone)
35 (415) 442-1001 (Facsimile)
36 *kroger@morganlewis.com*

37 *Attorneys for Defendants*
38 Hitachi, Ltd., Hitachi Displays, Ltd. and Hitachi
39 Electronic Devices (USA), Inc.

By: /s/ Robert Wick

Robert Wick (*pro hac vice*)
Neil Roman (*pro hac vice*)
Derek Ludwin (*pro hac vice*)
COVINGTON & BURLING LLP
1201 Pennsylvania Ave., NW
Washington, DC 20004
(202) 662-6000 (Phone)
(202) 662-6291 (Facsimile)
rwick@cov.com

Attorneys for Defendants

Samsung Electronics Co., Ltd.,
Samsung Semiconductor, Inc. and
Samsung Electronics America, Inc.

By: /s/ John M. Grenfell

John M. Grenfell (State Bar No. 88500)
Jacob R. Sorensen (State Bar No. 209134)
Fusae Nara (*pro hac vice*)
Andrew D. Lanphere (State Bar No. 191479)
PILLSBURY WINTHROP SHAW PITTMAN LLP
50 Fremont Street
San Francisco, CA 94105
(415) 983-1000 (Phone)
(415) 983-1200 (Facsimile)
john.grenfell@pillsburylaw.com

Attorneys for Defendants

Sharp Corporation
Sharp Electronics Corp.

1
2 By: /s/ Christopher M. Curran
3 Christopher M. Curran (*pro hac vice*)
4 Kristen J. McAhren (*pro hac vice*)
5 WHITE & CASE LLP
6 701 Thirteenth Street, NW
7 Washington, DC 20005-3807
8 (202) 626-3600 (Phone)
9 (202) 639-9355 (Facsimile)
10 *ccurran@whitecase.com*

11
12
13 Attorneys for Defendants
14 Toshiba Corporation, Toshiba Mobile Display Co.,
15 Ltd., Toshiba America Electronic Components, Inc.
16 and Toshiba America Information Systems, Inc.

17 By: /s/ Richard L. Schwartz
18 Richard L. Schwartz (*pro hac vice*)
19 Geralyn J. Trujillo (*pro hac vice*)
20 John A. Ioannou (*pro hac vice*)
21 Assistant Attorneys General
22 Office of the Attorney General, State of New York
23 120 Broadway, 26th Floor
24 New York, New York 10271
25 (212) 416-8262 (Telephone)
26 (212) 416-6015 (Facsimile)

27
28 Attorneys for Plaintiff
State of New York

Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

SO ORDERED



26 Honorable Susan J. Illston
27 5/9/11
28

Date Entered